

HAZARDOUS WASTE FACILITY PERMIT

California Environmental Protection Agency Department of Toxic Substances Control

Facility Name:

Pacific Resource Recovery Services 3150 E. Pico Boulevard, Los Angeles, California 90023

Owner Name:

Pacific Resource Recovery Services 3150 E. Pico Boulevard, Los Angeles, California 90023

Operator Name:

Pacific Resource Recovery Services 3150 E. Pico Boulevard, Los Angeles, California 90023 Facility EPA ID Number: CAD008252405

Effective Date: Draft

Expiration Date: Draft

Pursuant to Section 25200 of the California Health and Safety Code, this RCRAequivalent Hazardous Waste Facility Permit is hereby issued to: Pacific Resource Recovery Services.

The Issuance of this Permit is subject to the conditions set forth in Attachment A and the Revised Part "B" Application (Operation Plan), dated August 17, 2009, and the supplemental document on the rail car specification and loading/unloading area dimensions, dated April 13, 2011. The Attachment A consists of <u>28 pages</u> including Figures 1, 2, and 3.

PART I. <u>DEFINITIONS</u>

PACIFIC RESOURCE RECOVERY SERVICES 3150 EAST PICO BOULEVARD, LOS ANGELES, CALIFORNIA 90023 EPA ID Number: CAD 008252405

HAZARDOUS WASTE FACILITY PERMIT,

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All terms used in this Permit shall have the same meaning as those terms have in the California Health and Safety Code, division 20, chapter 6.5 and California Code of Regulations, title 22, division 4.5, unless expressly provided otherwise by this Permit.

- 1. "DTSC" as used in this Permit means the California Department of Toxic Substances Control.
- 2. "Permittee" as used in this Permit means the Owner and Operator.
- 3. **"Health & Safety Code"** as used in this Permit means the California Health and Safety Code.
- 4. "California Code of Regulations" as used in this Permit means the California Code of Regulations.
- 5. Unless explicitly stated otherwise, all references to items in this Permit shall reference only to items occurring within the same part.

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PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP

1. OWNER OF FACILITY

The Owner of the Facility is the Pacific Resource Recovery Services, a California Corporation (hereafter "Owner"). 3150 E. Pico Boulevard,

Los Angeles, California

2. OWNER OF REAL PROPERTY

The Owner of the Real Property is the Berg Family Partners, Limited Partnership (L.P.)

3150 E. Pico Boulevard, Los Angeles, California

3. OPERATOR

The Operator of the Facility is Pacific Resource Recovery Services, a California Corporation (hereafter "Operator").

3150 E. Pico Boulevard, Los Angeles, California

4. LOCATION

The Pacific Resource Recovery Services (PRRS or Facility) is located at 3150 East Pico Boulevard, in the City of Los Angeles, California 90023. Figure 1 shows the Facility location and surrounding area. It is located at Latitude North 34⁰1'10", Longitude West 118⁰ 12'35" in Section T25, Township 2 South, Range 13 West (San Bernardino Base Line Meridian).

5. <u>DESCRIPTION</u>

The Facility occupies approximately three (3) acres in mostly heavily industrial surroundings, zoned M3-1 by the City of Los Angeles. The Facility's hazardous waste management activities include transportation, transfer, storage, treatment, and consolidation of hazardous wastes and materials. The hazardous waste management area occupies approximately 0.4 acre or less than 20% of the Facility. Figure 2 presents the general layout of the Facility.

The Facility was issued a RCRA-equivalent hazardous waste facility permit (Permit) in 1993 by the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC). The Permit allowed the Permittee to reclaim chemical wastes generated on site or collected from the Permittee's customers. The Permit also allowed the Permittee to handle a variety of non-RCRA (California-regulated)

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wastes, including oil and petroleum-contaminated wastes.

This Permit is renewed to authorize the operation of hazardous waste manage activities in seven (7) hazardous waste management units (HWMUs). These units include two (2) container storage units; one (1) storage tank area for tank storage and/or treatment units; two (2) solvent recycling units [Thin-Film-Evaporator (TFE) and Tube Still]; one (1) compactor unit; and one (1) existing blending and liquefaction unit with equipment modification (additional liquefaction vat with the same mixer) without change of the maximum treatment capacity.

In addition, the Permittee conducts other activities exempt from the requirement of obtaining a hazardous waste facility permit: (1) 10-day transfer universal waste handling, (2) 10-day transfer activities for shipments originating at generator locations and destined for authorized facilities other than PRRS (3) Storage of Hazardous Materials; and, (4) Satellite 90-day Accumulation activities.

Solid hazardous wastes generated from recycling operations are compacted and consolidated into 55-gallon containers and stored in the container storage area (Unit 1) while awaiting shipment by truck to another off-site Facility for further treatment and disposal.

6. FACILITY HISTORY

The Facility at 3150 E. Pico Blvd has been a paint manufacturing plant since the 1930's. The Berg Family purchased the property in 1977 and leased it to their paint manufacturing and solvent distribution company, known as Ellis Paint Company and Pacific Coast Lacquer (PCL). PRRS was incorporated in April 1990 to assume the operation function of the paint related recycling program from its sister company PCL, who began recycling solvent waste in 1979 from its customers. Currently, PRRS accounts for 20% of the total operating space and sales volume. Ellis Paint Company, including PCL, represents the other 80%. PRRS was issued a RCRA-equivalent hazardous waste facility permit in 1993. Since then, two class I and one class II permit modifications were authorized by DTSC. On August 1, 2003, the Permittee submitted a hazardous waste facility permit renewal application. The Revised Part "B" Application (Operation Plan), dated August 17, 2009, and the supplemental document on the rail car specification and rail car loading/unloading area dimensions, dated April 13, 2011, were deemed technically complete on August 2, 2011. (See Figure 3).

7. FACILITY SIZE AND TYPE FOR FEES

The Facility is categorized as a Large Storage or Treatment facility for purposes of Health and Safety Code, section 25205.19.

8. CLOSURE COST ESTIMATES

The closure cost estimate approved is: \$965,531 (in 2011 dollars).

PART III. GENERAL CONDITIONS

1. PERMIT APPLICATION DOCUMENTS

(a) The Revised Part "B" Application (Operation Plan), dated August 17, 2009 and the supplemental document on the rail car specification and loaning/unloading area dimensions dated April 13, 2011 (Figure 3) are hereby made a part of this Permit by reference.

2. <u>EFFECT OF PERMIT</u>

- (a) The Permittee shall comply with the provisions of the Health and Safety Code, and division 4.5 of California Code of Regulations, title 22. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to, the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.
- (b) The Permittee is permitted to transfer, store, and treat hazardous wastes in accordance with the conditions of this Permit. Any transfer, treatment or storage of hazardous wastes not specifically authorized in this Permit is strictly prohibited.
- (c) Compliance with the terms of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.
- (d) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.
- (e) Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to Health and Safety Code, section 25187.
- (f) In addition, failure to submit any information required in connection with the Permit, or falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit (Cal. Code of Regulations title 22, section 66270.43).

- (g) In case of conflicts between the Operation Plan and the Permit, the Permit conditions take precedence.
- (h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards and any conditions imposed pursuant to section 13227 of the Water Code.

3. <u>COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)</u>

A Negative Declaration has been prepared in the accordance with the requirements of Public Resources Code Section 21000 et seq. and the CEQA Guidelines, Section 15070 et seq. of Title 14, California Code of Regulations.]

4. ENVIRONMENTAL MONITORING

The Permittee shall comply with the applicable environmental monitoring and response program requirements of California Code of Regulations, title 22, division 4.5, chapter 14, articles 6 and 17.

5. WASTE MINIMIZATION CERTIFICATION

The Permittee shall certify annually that it has a hazardous waste reduction and minimization program and method in place and shall keep the annual certification as part of its Operating Record in accordance with California Code of Regulations, title 22, section 66264.73(b)(9).

6. ACCESS

(a) DTSC, its contractors, employees, agents, and/or any United States Environmental Protection Agency representatives are authorized to enter and freely move about the Facility for the purposes of interviewing Facility personnel and contractors; inspecting records, operating logs, and contracts relating to the Facility; reviewing progress of the Permittee in carrying out the terms of Part VI of the Permit; conducting such testing, sampling, or monitoring as DTSC deems necessary; using a camera, sound recording, or other documentary-type equipment; verifying the reports and data submitted to DTSC by the Permittee; or confirming any other aspect of compliance with this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5. The Permittee shall provide DTSC and its representatives access at all reasonable times to the Facility and any other property to which access is required for implementation of any provision of this Permit, Health and Safety Code, division 20, chapter 6.5. and California Code of Regulations, title 22, division 4.5, and shall allow such persons to inspect and copy all records, files, photographs, documents,

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including all sampling and monitoring data, that pertain to work undertaken pursuant to the entire Permit or undertake any other activity necessary to determine compliance with applicable requirements.

(b) Nothing in this Permit shall limit or otherwise affect DTSC's right to access and entry pursuant to any applicable State or federal laws and regulations.

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PART IV. PERMITTED UNITS AND ACTIVITIES

This Permit authorizes operation only of the facility units and activities listed below. The Permittee shall not treat, store or transfer hazardous waste in any unit other than those specified in this Part IV. Any modifications to a unit or activity authorized by this Permit require the written approval of DTSC in accordance with the permit modification procedures set forth in California Code of Regulations, title 22.

This Permit authorizes the Permittee to operate in Seven (07) hazardous wastes management units (HWMUs).

This Permit authorizes the Permittee to continue the operation of the loading of ignitable materials/wastes directly from tanks 84 and 85 to a tank railcar at the contained railcar loading/unloading area adjacent to the authorized tank storage area. The railcar then transfers the materials/wastes to an off-site cement kiln manufacturer as fuel for energy reclamation.

The Permittee shall conduct loading and unloading operations, not subject to the 10-day transfer exemption, in accordance with the requirements specified in Health and Safety Code section 25200.19(c). The Permittee shall also comply with the requirements as specified in section 7904.5 of the Uniform Fire Code (UFC) for the loading and unloading of transport vehicles. Section 7904.5.2.2 of the UFC indicates that the loading rack dispensing Class I, II, or III-A ignitable or flammable liquids shall be located at least 25 feet from the property line. The shortest distance of the loading railcar is located approximately 33 feet from the Facility boundary.

1. UNIT NAME: Main Warehouse (Unit No.1)

<u>LOCATION</u>: Unit No.1 is located south of the Ellis Paint Warehouse. Unit No. 1 is formerly known as Container/Drum Storage Building-No.2, Area B.

ACTIVITY TYPE: storage of hazardous waste in containers.

<u>ACTIVITY DESCRIPTION</u>: The operation activities in Unit No.1 include:

- (a) Waste sampling activities: Incoming containerized hazardous wastes are loaded and sampled in the western portion of Unit No.1 area with 1650 ft² (75 feet length by 22 feet width). The sampled wastes are transferred to the appropriate other Units for further storage or treatment.
- (b) Container storage activities: Hazardous wastes are stored in 110 gallons or less containers/drums (mostly 55 gallons) that meet the applicable U.S. Department of Transportation (DOT) regulations for packaging hazardous wastes for transportation.

- PHYSICAL DESCRIPTION: Unit No.1 is an indoor container storage area with an area of approximately 11,625 ft² (155 feet long by 75 feet wide) surrounded by four 12 feet high concreted walls in the warehouse building. The floor is constructed of a 6-12 inch thick, solvent-resistant epoxy coated reinforced concrete level slab with six (6 inch) high ramps to allow forklift traffic between the storage and other operational areas.
- MAXIMUM CAPACITY: The maximum storage capacity is 113,080 gallons (equivalent to 2056 55-gallon containers).
- <u>WASTE SOURCES</u>: General industrial wastes, including paint and coating manufacturing process wastes from off-site and on-site sources.
- WASTE TYPES: General industrial wastes, including paint and coating-related wastes, including waste thinner (halogenated and non-halogenated); paint waste; used paint filter; still bottom; rags; personnel protection equipment (PPE); cleanup debris; and aqueous wastes. Constituents of wastes received and stored may include arsenic, barium, cadmium, chromium, chromium, lead, mercury, selenium, silver, benzene, chlorobenzene, chloroform, o-cresol, m-cresol, p-cresol, cresol, methyl ethyl ketone (MEK), pyridine, tetrachloroethylene, trichloroethylene, halogenated and non-halogenated solvents, flammable solids, hazardous solids, non-regulated latex paint, non-regulated coolants, non-regulated solids, non-regulated oils, fuel blend, hazardous waste water, household hazardous waste, and universal wastes.
- RCRA WASTE CODES: The RCRA Waste Codes listed in Table 1 are authorized for compatible hazardous waste transfer and storage in containers in this unit.
- <u>CALIFORNIA HAZARDOUS WASTE CODES</u>: The California Waste Codes (Non-RCRA) listed in Table 2 are authorized for compatible hazardous waste transfer and storage, in containers in this unit.

UNIT SPECIFIC SPECIAL CONDITIONS:

- (a) The Permittee shall include the volume of household and/or universal wastes stored in this unit as part of the maximum permitted storage capacity for this unit.
- (b) The Permittee shall maintain a 50-foot buffer zone between the property line and all containers of flammable/ignitable wastes.
- AIR EMISSION STANDARDS: The Permittee shall comply with the air emission standards of California Code of Regulations, title 22, division 4.5, chapter 14, Articles 27, 28, and 28.5.

2. UNIT NAME: Processing Area Container Storage Unit (Unit No.2)

<u>LOCATION</u>: Unit No.2 is located south of the Ellis Paint Factory, in the eastern portion of the Processing Area, west of the Main Warehouse. Unit No. 2 is formerly known as Container/Drum Storage Building -No.1, or Area A-1.

ACTIVITY TYPE: storage of hazardous waste in containers/drums

ACTIVITY DESCRIPTION: The operation activities in Unit No.2 include:

- (a) Waste transfer activities: Hazardous wastes are stored and transferred to the tank area or to the liquefaction process unit for further treatment or prepared to be transported off-site for further treatment or disposal at authorized facilities.
- (b) Container storage activities: Hazardous wastes are stored in 110 gallon or less containers/drums (mostly 55 gallons) that meet the applicable U.S. Department of Transportation (DOT) regulations for packaging hazardous wastes for transportation.
- PHYSICAL DESCRIPTION: The Processing Area is an indoor area and is divided into three areas including the container storage unit, the liquefaction unit, and the compactor unit. The Processing Area measures 53 feet long by 23 feet wide with the total area of 1206 square feet. The floor is constructed of a 6-12-inch thick, solvent-resistant epoxy coated reinforced concrete level slab with ramps to allow forklift traffic between the storage and other operational areas. This Unit is an indoor unit. The container/drum storage area includes approximately 276 ft² (23 feet long by 12 feet wide)
- MAXIMUM CAPACITY: The maximum storage capacity is 2,640 gallons (equivalent to 48 55-gallon containers/drums).
- <u>WASTE SOURCES</u>: General industrial wastes, including paint and coating manufacturing process wastes from off-site and on-site sources.
- WASTE TYPES: General industrial wastes, paint and coating-related wastes, including waste thinner (halogenated and non-halogenated); paint waste; used paint filter; still bottom; rags; personnel protection equipment (PPE); cleanup debris; and aqueous wastes. Constituents of wastes received and stored may include arsenic, barium, cadmium, chromium, chromium, lead, mercury, selenium, silver, benzene, chlorobenzene, chloroform, o-cresol, m-cresol, p-cresol, cresol, methyl ethyl ketone (MEK), pyridine, tetrachloroethylene, trichloroethylene, halogenated and non-halogenated solvents, flammable solids, hazardous solids, non-regulated latex paint, non-regulated coolants, non-regulated solids, non-regulated oils, fuel blend, hazardous waste water, household hazardous waste, and universal wastes.

RCRA WASTE CODES: The RCRA Waste Codes listed in Table 1 are authorized

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for compatible hazardous waste transfer, storage, and consolidation in containers in this unit.

<u>CALIFORNIA HAZARDOUS WASTE CODES</u>: The California Waste Codes (Non-RCRA) listed in Table 2 are authorized for compatible hazardous waste transfer and storage, in containers in this unit.

AIR EMISSION STANDARDS:

The Permittee shall comply with the air emission standards of California Code of Regulations, title 22, division 4.5, chapter 14, Articles 27, 28, and 28.5.

3. UNIT NAME: Storage Tank Area (Unit No.3)

LOCATION: Unit No. 3 is located southwest of the Facility

ACTIVITY TYPE: storage and/or treatment of hazardous waste in tanks

ACTIVITY DESCRIPTION: Storage Tank Area has six (6) above-ground hazardous waste management tanks (Tank Nos. 59, 61, 81, 82, 84, and 85, hereafter called T-59, T-61, T-81, T-82, T-84, and T-85). This Unit receives solvent wastes by pumping from tank trucks or containers received and stored at the Facility. The incoming wastes are either stored in these tanks, or treated by blending and mixing before going to the recycling process. The following operation descriptions are provided for each of these six tanks.

T-59: The operation activities include:

- (a) Waste transfer activities: T-59 receives wastes by pumping from tank trucks or containers received and stored at the Facility. The solvent wastes stored in tank T-59 are transferred to other tanks (T-61, T-81, T-82, T-84, and T-85) for storage or treatment by blending and mixing before going to the recycling process.
- (b) Waste storage in tank activities: The solvent wastes are stored in tank T-59 before transferring to other tanks for further treatment.

T-61: The operation activities include:

- (a) Waste transfer activities: T-61 receives wastes by pumping from tank trucks or containers received and stored at the Facility. The solvent wastes stored in tank T-61 are transferred to other tanks (T-59, T-81, T-82, T-84, and T-85) for storage or treatment by blending and mixing before going to the recycling process.
- (b) Waste storage in tank activities: The solvent wastes are stored in tank T-61 before transferring to other tanks for further treatment.

T-81: The activities include:

(a) Waste storage in tanks: Tank No.81 is used to store solvent wastes.

- (b) Blending in tanks: Tank No. 81 is top-equipped with mixers and is used for storing and blending of solvent wastes which are later shipped to other facilities as fuels for burning or incineration.
- (c) Waste transfer activities: The received solvent wastes are blended and mixed by an agitator installed at Tank No. 81 before going to the waste recycling processes for further treatment.

T-82: The activities include:

- (a) Waste storage in tanks: Tank No.82 is used to store solvent wastes.
- (b) Blending in tanks: Tank No. 82 is top-equipped with mixers and is used for storing and blending of solvent wastes which are later shipped to other facilities as fuels for burning or incineration.
- (c) Waste transfer activities: The received solvent wastes are blended and mixed by an agitator installed at Tank No. 82 before going to the waste recycling processes for further treatment.

T-84: The activities include:

- (a) Waste storage in tanks: Tank No.84 is used to store fuels/solvent wastes which were generated from on-site paint manufacturing and from the recycling processes, i.e. thin-film-evaporator (Unit No.9), tube still (Unit No.
- 9), and liquefaction processing (Unit No. 12) treatment units.
- (b) Waste blending in tanks: Tank No. 84 is top-equipped with agitators (mixers) which are used for blending of solvent wastes and still bottoms coming from recycling processes at site.
- (c) Waste transfer activities: The reclaimed solvent wastes and still bottoms generated from the recycling processes are pumped to a railcar adjacent to the storage tank area for off-site shipment.

T-85: The activities include:

- (a) Waste storage in tanks: Tank No.85 is used to store fuels/solvent wastes which were generated from on-site paint manufacturing and from the recycling processes, i.e. thin-film-evaporator (Unit No.9), tube still (Unit No.
- 9), and liquefaction processing (Unit No. 12) treatment units.
- (b) Waste blending in tanks: Tank No. 85 is top-equipped with agitators (mixers) which are used for blending of solvent wastes and still bottoms coming from recycling processes at the site.
- (c) Waste transfer activities: The reclaimed solvent wastes and still bottoms generated from the recycling processes are pumped to a railcar adjacent to the storage tank area for off-site shipment.

<u>PHYSICAL DESCRIPTION</u>: The shoe-shape storage tank area floor is approximately 3,892 square feet (approximately 83 feet long by 46 feet wide with a 31- inch high dike wall). The available secondary containment volume for this storage tank area is 47,738 gallons. The floor is constructed of a 6-12-inch thick, solvent-resistant epoxy coated reinforced concrete level slab.

T-59 is a vertical fixed roof, welded flat-bottom carbon steel tank with level gauge which is approximately 8 feet in diameter and 16 feet in height. The structural supports for this tank are padded with concrete and anchor chairs.

T-61 is a vertical fixed roof, welded flat-bottom carbon steel tank with level gauge which is approximately 8 feet in diameter and 16 feet in height. The structural supports for this tank are padded with concrete and anchor chairs.

T-81 is a vertical fixed roof, dish-bottom carbon steel tank, which is approximately 9.5 feet in diameter and 20 feet in height. It is equipped with spill prevention control devices, including overfill prevent control level indicator and high level alarm. The structural supports for this tank are padded with concrete footings and legs with base plates that are anchored to the concrete slab.

T-82 is a vertical fixed roof, riveted flat-bottom carbon steel tank which is approximately 12 feet in diameter and 12 feet in height. It is equipped with spill prevention control devices, including overfill prevent control level indicator and high level alarm. The structural supports for this tank is padded with concrete and anchor chairs. A solvent condensation and recovery system was installed for process vent control of this unit for the control of air pollutant emissions.

T-84 is a vertical fixed roof, riveted flat-bottom carbon steel tank which is approximately 12 feet in diameter and 12 feet in height. It is equipped with spill prevention control devices, including overfill prevent control level indicator and high level alarm. The structural supports for this tank are padded with concrete and anchor chairs.

T-85 is top-equipped with agitators (mixers) which are used for blending of solvent wastes and still bottoms coming from recycling processes at the site.

MAXIMUM CAPACITY: The maximum tank storage capacity is:

<u>T</u>-59: 5,000 gallons.

T-61: 5,000 gallons

T-81: 10,000 gallons

T-82: 10,000 gallons

<u>T</u>-84: 10,000 gallons

T-85: 10,000 gallons

<u>1</u>-05. 10,000 gallons

<u>WASTE SOURCES</u>: General industrial wastes, including paint and coating manufacturing process wastes from off-site and on-site sources.

<u>WASTE TYPES</u>: General industrial wastes, including paint and coating-related solvent wastes, halogenated and non-halogenated solvents.

<u>RCRA WASTE CODES</u>: The RCRA Waste Codes listed in Table 3 are authorized for waste storage in tanks.

<u>CALIFORNIA WASTE CODES</u>: The California Waste Codes (Non-RCRA) listed in Table 3 are authorized for wastes storage in tanks.

<u>AIR EMISSION STANDARDS</u>: The Permittee shall comply with the air emission standards of California Code of Regulations, title 22, division 4.5, chapter 14, Articles 27, 28, and 28.5.

The Permittee shall comply with the standards for equipment leaks as specified in Section N of the Operation Plan; and the standards for tanks and containers as specified in Section O of the Operation Plan.

The Permittee shall comply with the requirements as specified in the operation permit issued by South Coast Air Quality Management District.

4. UNIT NAME: Thin Film Evaporator Module (TFE-1, Unit No.4)

<u>LOCATION</u>: Unit No. 4 is located in the middle of the process area at the western portion of the Facility. It is located adjacent to the tank car loading/unloading area and north of the Tube Still unit.

ACTIVITY TYPE: Treatment of hazardous wastes.

<u>ACTIVITY DESCRIPTION</u>: TFE-1 receives wastes from tanks and containers. The waste is filtered, heated, evaporated and condensed in TFE-1. Recycled product is transferred to one of the product storage tanks in the storage tank area for shipment. Still bottoms are transferred to waste blending tanks T-84, or T-85 for recycling process.

PHYSICAL DESCRIPTION: TFE-1 is located outdoors in the distillation process area. This process area is concreted and sloped to a trench that flows into the tank containment area. The structural supports for TFE-1 are padded with concrete and anchor chairs. The available secondary containment volume for tank area is 47,738 gallons. The floor is constructed of a 6-inch thick, solventresistant acid-resistant coated reinforced concrete level slab. TFE-1 includes a Thin Film Evaporator (TFE), two Condensers (C-1, C-2), two product tanks (Tank No. 102 and Tank No. 103), and a sludge tank (Tank No. 101). TFE-1 was installed in 1986 to replace the original solvent distillation unit. TFE-1 is a solvent reclamation tank system and is equipped with a solvent condensation and recovery system for process vent control. TFE-1 is a 150-gallon vertical stainless steel tank, approximately 2.5 feet in diameter and 18 feet in height. The vapor phase stream is condensed through two series condensers (C-1 and C-2), then drops into a 150-gallon product holding tank (T-102) and a coalesced tank (T-103), and lastly transfers to a product tank in the tank area for storage. The sludges are pumped to an 850-gallon still bottoms tank (T-101), and

subsequently to the fuel blending system. A trench and pumping system directs spills from TFE-1 to the storage tank area. A 4-inch schedule 40 carbon steel piping with a gate valve connects the trench and storage tank area. The trench is 20 feet long, 2 feet wide and 28 inches deep with total capacity of 698 gallons.

- MAXIMUM CAPACITY: The maximum treatment capacity for this unit is 420 gallons per hour.
- <u>WASTE SOURCES:</u> On-site and off-site sources provide general industrial wastes, including paint and coating manufacturing process solvents and organic wastes.
- <u>WASTE TYPES</u>: General industrial wastes, including paint and coating-related solvent wastes, halogenated and non-halogenated solvents.
- <u>RCRA WASTE CODES</u>: The RCRA Waste Codes listed in Table 4 are authorized for treatment in the TFE System.
- <u>CALIFORNIA WASTE CODES</u>: The California Waste Codes (Non-RCRA) listed in Table 4 are authorized for treatment in the TFE System.
- <u>AIR EMISSION STANDARDS</u>: The Permittee shall comply with the air emission standards of California Code of Regulations, title 22, division 4.5, chapter 14, Articles 27, 28, and 28.5.

The Permittee shall comply with the standards for process vents as specified in Section M of the Operation Plan; the standards for equipment leaks as specified in Section N of the Operation Plan; and the standards for tanks and containers as specified in Section O of the Operation Plan.

The Permittee shall capture and control all venting from the hazardous waste containers or tanks through a closed-vent system to a vapor recovery system pursuant to the operation permit (permit number, D74325, dated May 2007) issued by South Coast Air Quality Management District.

5. <u>UNIT NAME: Tube Still (DS-1, formerly was named as TFE-2, Unit No.5)</u>

- <u>LOCATION:</u> Unit No. 5 is located in the process area and western portion of the Facility. This unit is located south of TFE-1 and north of Emergency Tank No. 1.
- <u>ACTIVITY TYPE</u>: treatment of hazardous wastes.
- ACTIVITY DESCRIPTION: This unit receives wastes by pumping from tank T-82. The waste is pre-heated through a channel in the condenser C-4, then heated, and evaporated in DS-1. The vapor phase flows through a packed column to

condenser C-4, then drops into a 500-gallon product holding tank (Receiver 201). The condensed product is then pumped to a product tank in the storage tank area. A large portion of feed wastes evaporates in the DS-1. The sludge remains in the DS-1 until it reaches unacceptable levels for processing, and then DS-1 is opened and cleaned. Residues are managed through fuel blending.

- PHYSICAL DESCRIPTION: DS-1 is located outdoors in the process area. The process area is concreted and sloped to a trench that directs spill flows into the tank containment area through a pump and piping system. The floor is constructed of a 6-inch thick, solvent-resistant acid-resistant coated reinforced concrete level slab. The available secondary containment volume for the storage tank area is 47,738 gallons. DS-1 consists of a tube-style distillation still component, a condenser, and a product-holding tank. The tube is a horizontal carbon steel tank, approximately 1.5 feet in diameter and 5.5 feet in height. The structural supports for DS-1 are padded with concrete and anchor chairs.
- MAXIMUM CAPACITY: The maximum treatment capacity for this unit is 600 gallons per hour.
- <u>WASTE SOURCES:</u> On-site and off-site sources provide general industrial wastes, including paint and coating manufacturing process solvents and organic wastes.
- <u>WASTE TYPES</u>: General industrial wastes, including paint and coating-related solvent wastes, halogenated and non-halogenated solvents.
- RCRA WASTE CODES: The RCRA Waste Codes listed in Table 4 are authorized for treatment in this unit.
- <u>CALIFORNIA WASTE CODES</u>: The California Waste Codes (Non-RCRA) listed in Table 4 are authorized for treatment in this unit.
- <u>AIR EMISSION STANDARDS</u>: The Permittee shall comply with the air emission standards of California Code of Regulations, title 22, division 4.5, chapter 14, Articles 27, 28, and 28.5.

The Permittee shall comply with the standards for process vents as specified in Section M of the Operation Plan; the standards for equipment leaks as specified in Section N of the Operation Plan; and the standards for tanks and containers as specified in Section O of the Operation Plan.

The Permittee shall capture and control all venting from the hazardous waste containers or tanks through a closed-vent system to a vapor recovery system pursuant to the operation permit (permit number, M31554, dated May 2007) issued by South Coast Air Quality Management District.

6. <u>UNIT NAME: Container Crusher (Compactor) (Unit No.6)</u>

<u>LOCATION:</u> Unit No. 6 is located at the northwest end of the processing area, west of the liquefaction vat unit.

<u>ACTIVITY TYPE</u>: treatment of hazardous wastes.

- <u>ACTIVITY DESCRIPTION</u>: Damaged or excess containers are cleaned, drained, emptied, and compacted in the compactor. The compactor is used to compact solid wastes, such as spray booth filters, empty 55-gallon containers, and metal cans, into other containers (generally 55-gallon in volume). These compacted wastes are sent off-site for thermal destruction, other disposal, or scrap metal reclamation.
- PHYSICAL DESCRIPTION: The Processing Area has three sections: the compactor unit, the liquefaction unit, and the container storage unit. The compactor is approximately 3.5 feet long and 1.5 feet wide. This unit occupies the western portion of the Processing Area which measures 53 feet long by 23 feet wide with the total area of 1206 square feet. The floor is constructed of a 6-12-inch thick, solvent-resistant epoxy coated reinforced concrete level slab with ramps to allow forklift traffic between the storage and other operational areas.
- MAXIMUM CAPACITY: The maximum treatment capacity for this unit is 10 tons per day.
- <u>WASTE SOURCES:</u> On-site and off-site sources provide general industrial wastes, including paint and coating manufacturing process solvents and organic wastes.
- <u>WASTE TYPES</u>: General industrial wastes, including paint and coating-related wastes.
- RCRA WASTE CODES: The RCRA Waste Codes, D004, D005, D006, D007, D008, D009, D010, and D011, are authorized for treatment of hazardous wastes in containers at this unit.
- CALIFORNIA WASTE CODES: The California Waste Codes (Non-RCRA), 141, 171, 172, 181, 222, 271, 272, 291, 512, 513, 521, and 561 are authorized for treatment of hazardous wastes in containers at this unit.
- AIR EMISSION STANDARDS: The container compacting activity is not subject to the air emission standards of California Code of Regulations, title 22, division 4.5, chapter 14, Articles 27, 28, and 28.5, nor is it required to be controlled under the operation permit issued by the South Coast Air Quality Management District.

7. UNIT NAME: Liquefaction Unit (Unit No. 7)

<u>LOCATION:</u> Unit No. 7 is located in the middle of the processing area.

ACTIVITY TYPE: treatment of solvent wastes.

- ACTIVITY DESCRIPTION: Containerized wastes are poured into the liquefaction vat, then liquefied and treated by mixing with liquid thinners through a high-speed mixer. A screen inserted into the liquefaction vat is used to filter out solids before transferring to a storage tank area for fuel blending or solvent reclamation.
- <u>PHYSICAL DESCRIPTION</u>: This unit is an existing blending and liquefaction unit with proposed equipment modification for adding a second liquefaction vat to improve the process efficiency without change of the maximum treatment capacity. This unit shall include two stainless vats and a common mixer. Both stainless vats will be approximately 5 feet in diameter and 7 feet in height.
- MAXIMUM CAPACITY: The maximum treatment capacity for this unit is 7,500 gallons per day.
- <u>WASTE SOURCES:</u> On-site and off-site sources provide paint and coating manufacturing process solvents and organic wastes.
- <u>WASTE TYPES</u>: Paint and coating-related solvent wastes, halogenated and non-halogenated solvent wastes, non-regulated latex paint, non-regulated coolants, fuel blend.
- <u>RCRA WASTE CODES</u>: The RCRA Waste Codes listed in Table 5 are authorized for treatment in the Liquefaction Unit.
- <u>CALIFORNIA WASTE CODES</u>: The California Waste Codes (Non-RCRA) listed in Table 5 are authorized for treatment in the Liquefaction Unit

UNIT SPECIFIC SPECIAL CONDITIONS:

(a) The Permittee shall submit a completion certification report prepared by a California registered engineer for the proposed liquefaction vat modification to DTSC for approval prior to startup.

<u>AIR EMISSION STANDARDS</u>: The Permittee shall comply with the air emission standards of California Code of Regulations, title 22, division 4.5, chapter 14, Articles 27, 28, and 28.5.

The Permittee shall comply with the standards for equipment leaks as specified in Section N of the Operation Plan; and the standards for tanks and containers as specified in Section O of the Operation Plan.

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The Permittee shall capture and control all venting from the hazardous waste containers or tanks through a closed-vent system to a vapor recovery system pursuant to the operation permit (permit number, D37190, dated May 2007) issued by South Coast Air Quality Management District.

Table 1 RCRA Waste Codes:

D			K			
D001	(Ignitable waste)	K086	(solvent washes and sludges			
D004	(arsenic)					
D005	(barium)	U				
D006	(cadmium)	U002	(acetone)			
D007	(chromium)	U031	(n-butyl alcohol)			
D008	(lead)	U037	(chlorobenzene)			
D009	mercury)	U056	(cyclohexane)			
D010	(selenium)	U057	(cyclohexanone)			
D011	(silver)	U080	(dichloromethane)			
D018	(benzene)	U112	(Ethyl acetate)			
D021	(chlorobenzene)	U140	(isobutyl alcohol)			
D022	(chloroform)	U154	(methanol)			
D023	(o-cresol)	U159	(methyl ethyl ketone)			
D024	(m-cresol)	U161	(methyl isobutyl ketone)			
D025	(p-cresol)	U196	(pyridine)			
D026	(cresol)	U210	(tetrachloethylene)			
D035	(methyl ethyl ketone)	U213	(tetrahydrofuran)			
D038	(pyridine)	U220	(toluene),			
D039	(tetrachloroethylene)	U226	(1,1,1 -trichloroethane)			
D040	(trichloroethylene)	U227	(1,1,2-trichloroethane)			
		U228	(trichloroethylene)			
	F	U239	(xylene)			
F001	(spent halogenated solvents used in degreasing)					
F002	(spent halogenated solvents)					
F003	(spent non-halogenated solvents)					
F004	(spent solvents)					
F005	(spent non-halogenated solvents)					

131	(aguague colution (2/nH/12.5) containing reactive anions
132	(aqueous solution (2 <ph<12.5) (aqueous="" anions="" containing="" metals)<="" reactive="" solution="" td="" with=""></ph<12.5)>
133	(aqueous solution with 10% or more total organic residues)
134	(aqueous solution with less than 10% total organic residues)
	· ·
135	(unspecified aqueous solution)
141	(Off-specification, aged, or surplus in-organics)
181	(other inorganic solid waste)
211	(halogenated solvents)
212	(oxygenated solvents)
213	(hydrocarbon solvents)
214	(unspecified solvent mixtures)
221	(waste oil and mixed oil)
222	(oil/water separation sludge)
223	(unspecified oil-containing waste)
252	(other still bottom waste)
261	(polychlorinated biphenyls and material containing PCBs)
281	(adhesives)
291	(latex waste)
331	(off-specification, aged, or surplus organics)
341	(organic liquids (non-solvents) with halogens
342	(organic liquids with metals)
343	(unspecified organic liquid mixture),
351	(organic solids with halogens),
352	(other organic solids)
461	(paint sludge)
491	(unspecified sludge waste),
512	(other empty containers, 30 gallon or more)
513	(empty containers less than 30 gallons)
551	(laboratory waste chemicals)
611	(contaminated soil from site cleanups)
612	(household waste)
722	(liquid with cadmium ≥100 mg/l)
723	(liquid with chromium(VI) ≥500 mg/l)
724	(liquid with lead ≥500 mg/l)
725	(liquid with mercury ≥20 mg/l)
726	(liquid with nickel ≥134 mg/l)
727	(liquid with selenium ≥100 mg/l)
728	(liquid with thallium ≥130 mg/l),
741	(liquid with halogenated organic compounds≥1000 mg/l)
751	(solids or sludges with halogenated organic compounds≥1000 mg/l)

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RCRA Waste Codes				California Waste Codes (Non-RCRA)				
D001	D018	D039	U031	U161	131	214	342	722
D004	D021	D040	U037	U196	132	221	343	723
D005	D022	F001	U056	U210	133	222	351	724
D006	D023	F002	U057	U213	134	223	352	725
D007	D024	F003	U080	U220	135	252	461	726
D008	D025	F004	U112	U226	141	261	491	727
D009	D026	F005	U140	U227	181	281	611	728
D010	D035	K086	U154	U228	211	291	612	751
D011	D038	U002	U159	U239	213	341		

TABLE 4– Authorized Waste Codes for TFE-1 & DS-1

RCRA Waste Codes					California Waste Codes (Non-RCRA)			
D001	D021	F001	U002	U161	133	461	741	
D004	D022	F002	U031	U196	211	551		
D005	D023	F003	U037	U210	212	612		
D006	D024	F004	U056	U213	213	722		
D007	D025	F005	U057	U220	214	723		
D008	D026	K086	U080	U226	252	724		
D009	D035		U112	U227	331	725		
D010	D038		U140	U228	341	726		
D011	D039		U154	U239	342	727		
D018	D040		U159		343	728		

Table 5-Authorized Waste Codes for Liquefaction

RCRA Waste Codes					California Waste Codes (Non-RCRA)			
D001	D021	F001	U002	U161	131	214	342	612
D004	D022	F002	U031	U196	132	221	343	722
D005	D023	F003	U037	U210	133	222	351	723
D006	D024	F004	U056	U213	134	223	352	724
D007	D025	F005	U057	U220	135	252	461	725
D008	D026	K086	U080	U226	141	261	491	726
D009	D035		U112	U227	181	281	512	727
D010	D038		U140	U228	211	291	513	728
D011	D039		U154	U239	212	331	551	741
D018	D040		U159		213	341	611	751

- 1. The Permittee shall store containers holding hazardous waste on pallets and shall not stack containers more than two containers high.
- 2. The Permittee shall maintain a minimum of 30 inches for the aisle space between rows of pallets. The labeling for each container shall be readable from each aisle.
- 3. Containers shall be segregated in each management area to separate wastes from products and to separate wastes based on waste types.
- 4. The Permittee shall not handle universal wastes at the authorized unit. The Permittee shall only conduct 10-day universal waste (UW) handling activities at the Ellis Paint Warehouse. The Ellis Paint Warehouse is located north of the Main Warehouse. The Permittee shall conduct loading/unloading of UW at the container loading/unloading area south of the Main Warehouse (Unit No. 1). The Permittee shall not accumulate more than 5,000 kilograms (kgs) total UWs in aggregate at any time and no more than 35 kgs of mercury that was drained from gauges on-site.

The Permittee shall conduct 10-day transfer activities at the container loading/unloading area south of the Main Warehouse (Unit No. 1) for shipments originating at generator locations and destined for authorized facilities other than PRRS. The Permittee shall notify DTSC verbally immediately and in writing when a railroad company is unable to transport the railcar from the Facility within the time of 10 days. In any event, the railcar transfer activity shall be completed within 20 days when the Permittee initiates the loading activity.

The Permittee shall conduct loading and unloading activities in compliance with the requirements specified in Health and Safety Code section 25200.19(c) and waste shall not held longer than 10 days at the following three loading/unloading locations at the Facility:

- (a) The container loading/unloading area occupies approximately 900 ft² (20' x 45'), located south of the Main Warehouse (Unit 1);
- (b) Railcar loading area occupies approximately 1,242 ft² (18' x 69'), located southwest of the Facility; and
- (c) Tanker truck loading/unloading area occupies approximately 2,767 ft² (irregular size, 90' x 18', plus 31' x 37'), located adjacent to the recycling process areas.
- 5. The Permittee shall comply with the requirements as specified in the section 7904.5 of the Uniform Fire Code (UFC) for the loading and unloading of transport vehicles i.e. fire protection, spill control and secondary containment, static protection, no smoking sign, security, top loading, switch loading, and electrical requirements.

The Permittee shall comply with all applicable state laws and regulations for air

quality control, water quality control, wastewater discharge requirements and others issued by the State Water Resources Control Board and California Regional Water Quality Board, Air Resource Board, South Coast Air Quality Management District.

The Permittee shall inspect daily the transfer vehicles and secondary containment in the loading/unloading areas to prevent any spills, leaks, and releases. The Permittee shall take prompt remediation action if any spill, crack, or release is found.

The Permittee shall ensure that storm/rain run-off that has accumulated in any loading/unloading area shall not flow to storm drains, inlets, or waters of the State.

The Permittee shall comply with the operational procedures described in the Revised Hazardous Waste Facility Permit Application, dated August 17, 2009.

- 6. The Permittee shall not store hazardous waste in excess of one year from the date the hazardous waste arrives at the Facility.
- 7. For the purpose of compliance with the permitted maximum capacity limitations, all containers in the permitted units are assumed to be full.
- 8. The Permittee shall inspect overfill control, above-ground portions of the tank systems, data from the leak detection systems, and construction materials and areas immediately surrounding the tank systems on a daily basis in accordance with California Code of Regulations, title 22, section 66264.195.

PART VI. CORRECTIVE ACTION

- 1. The Permittee shall conduct corrective action at the Facility pursuant to Health and Safety Code sections 25187 and 25200.10. Corrective action shall be carried out under the Corrective Action Consent Agreement (CACA) to be entered into agreement between the Permittee and DTSC. On March 30, 2010, DTSC sent a draft CACA to the Permittee. The Permittee shall execute the CACA within six months after this Permit is in effect. If the Permittee fails to execute a CACA within six months after the effective date of this Permit, DTSC shall issue a Corrective Action Order pursuant to Health and Safety Code sections 25187 and 25200.10.
- 2. To the extent that work being performed pursuant to Part VI of the Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access agreements necessary to complete work required by this Part of the Permit from the present owner(s) of such property within 30 days of approval of any work plan for which access is required. "Best efforts" as used in this paragraph shall include, at a minimum, a certified letter from the Permittee to the present owner(s) of such property requesting access agreement(s) to allow the Permittee and DTSC and its authorized representatives access to such property and the payment of reasonable sums of money in consideration of granting access. The Permittee shall provide DTSC with a copy of any access agreement(s). In the event that agreements for the access are not obtained within 30 days of approval of any work plan for which access is required, or of the date that the need for access becomes known to the Permittee, the Permittee shall notify DTSC in writing within 14 days thereafter regarding both efforts undertaken to obtain access and its failure to obtain such agreements. In the event DTSC obtains access, the Permittee shall undertake approved work on such property. If there is any conflict between this permit condition on access and the access requirements in any agreement entered into between DTSC and the Permittee, this permit condition on access shall govern.
- 3. Nothing in Part VI of the Permit shall be construed to limit or otherwise affect the Permittee's liability and obligation to perform corrective action including corrective action beyond the facility boundary, notwithstanding the lack of access. DTSC may determine that additional on-site measures must be taken to address releases beyond the Facility boundary if access to off-site areas cannot be obtained.

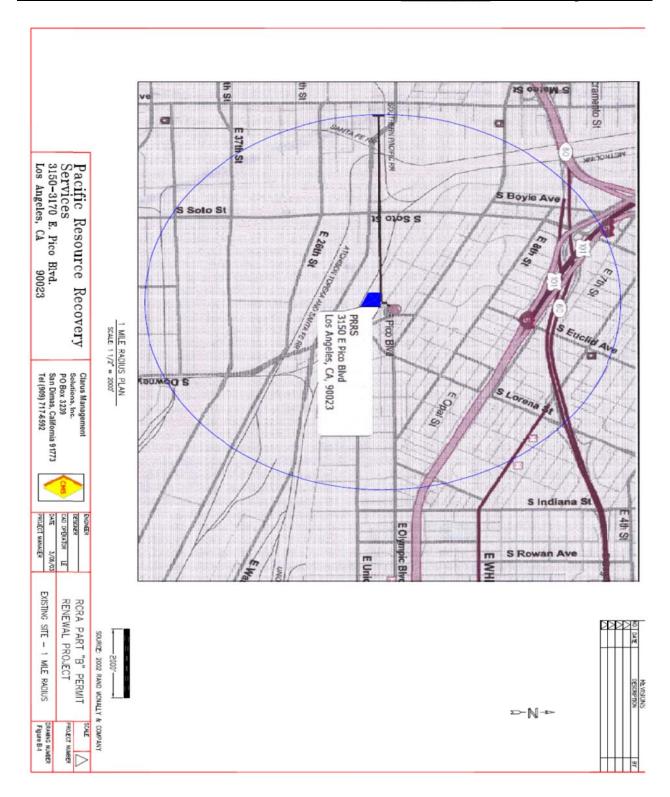


FIGURE 1: FACILITY LOCATION MAP

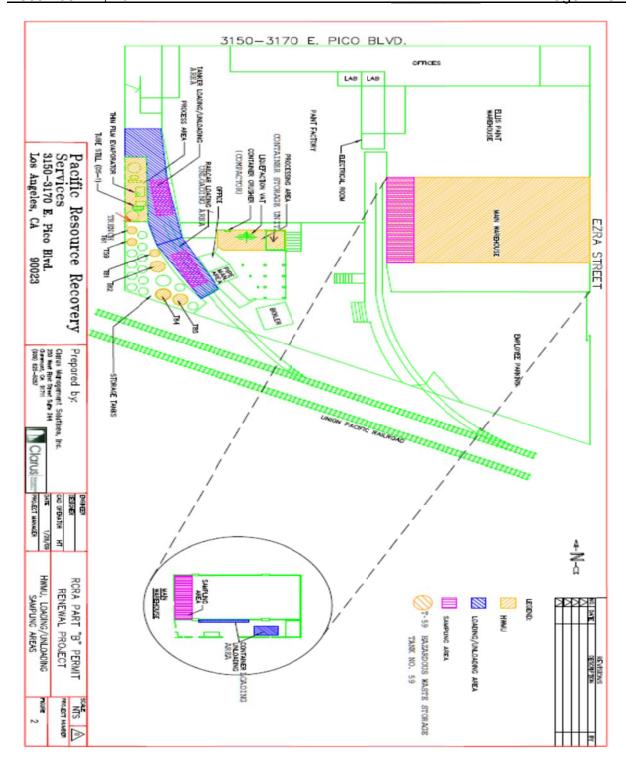


FIGURE 2: FACILITY MAP

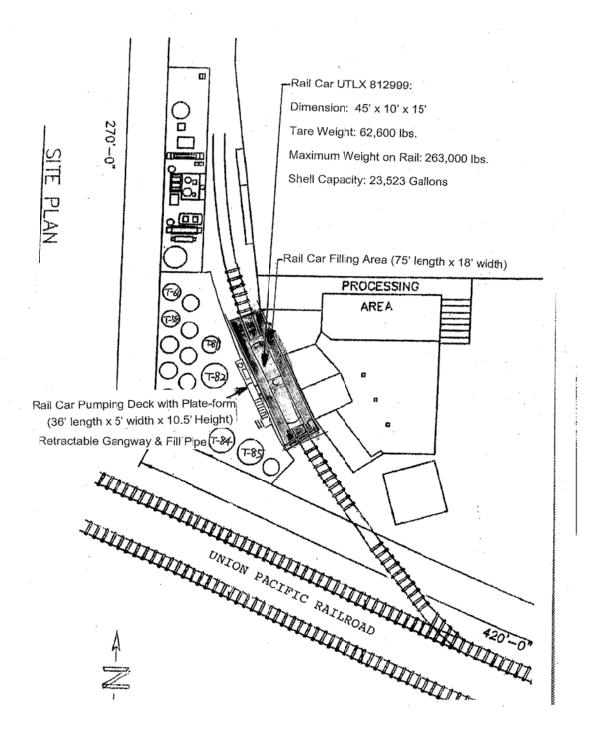


FIGURE 3: RAIL SPACE MAP